

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

D&T PARTNERS, LLC (successor in interest §  
to ACET VENTURE PARTNERS, LLC), §  
Directly and Derivatively on Behalf of ACET §  
Global, LLC and BAYMARK ACET §  
HOLDCO, LLC §  
§ Civil Action No. 3:21-CV-01171-B  
and §  
§  
ACET GLOBAL, LLC §  
§  
Plaintiffs, §  
§  
v. §  
§  
BAYMARK PARTNERS, LP; BAYMARK §  
PARTNERS MANAGEMENT, LLC; §  
BAYMARK MANAGEMENT, LLC; SUPER §  
G CAPITAL, LLC; SG CREDIT PARTNERS, §  
INC.; BAYMARK ACET HOLDCO, LLC; §  
BAYMARK ACET DIRECT INVEST, LLC; §  
BAYMARK PARTNERS; DAVID HOOK; §  
TONY LUDLOW; MATTHEW DENEGRE; §  
WILLIAM SZETO; MARC COLE; STEVEN §  
BELLAH; ZHEXIAN “JANE” LIN; DANA §  
MARIE TOMERLIN; PADASAMAI §  
VATTANA; PAULA KETTER; VANESSA §  
TORRES; WINDSPEED TRADING, LLC; §  
HALLETT & PERRIN, P.C.; and JULIE A. §  
SMITH, §  
§  
Defendants.

**DEFENDANTS’ UNOPPOSED MOTION TO EXTEND DEADLINE TO  
RESPOND TO PLAINTIFFS’ SECOND AMENDED COMPLAINT**

COME NOW Defendants Baymark Partners Management, LLC; Baymark ACET Holdco,  
LLC; Baymark ACET Direct Invest, LLC; Baymark Partners; David Hook; Tony Ludlow;  
Matthew Denegre; Baymark Management, LLC; Super G Capital, LLC; Steven Bellah;  
Windspeed Trading, LLC; William Szeto; Zhexian “Jane” Lin; Dana Marie Tomerlin; Padamasai

Vattana; Vanessa Torres; Paula Ketter; Hallett & Perrin, P.C.; Julie A. Smith; SG Credit Partners, Inc.; and Marc Cole; (collectively, “Defendants”) and file their Unopposed Motion to Extend Deadline to Respond to Plaintiffs’ Second Amended Complaint (herein “Motion”). Defendants respectfully request the Court extend the deadline for all Defendants to answer or otherwise respond to Plaintiffs’ Second Amended Complaint to on or before July 22, 2022, as authorized by Federal Rule of Civil Procedure 6(b).

#### **I. PROCEDURAL BACKGROUND**

1. Pursuant to the Court’s Memorandum Opinion and Order dated May 9, 2022, Plaintiffs filed their Second Amended Complaint on June 8, 2022. In that Second Amended Complaint, Baymark Management, LLC was added as a Defendant. To date, Baymark Management LLC has not been served. However, counsel for Baymark Management, LLC has indicated to Plaintiffs’ counsel that he is authorized to accept a Waiver of Service on behalf of Baymark Management, LLC.

2. Also pursuant to the Court’s May 9, 2022 Memorandum Opinion and Order, the deadline for all Defendants other than Baymark Management, LLC to answer or otherwise respond to the Second Amended Complaint is June 29, 2022.

3. To allow all Defendants sufficient time to prepare their respective responses to the Second Amended Complaint, as well as to provide a uniform deadline by which all Defendants, including the newly added Baymark Management, LLC, have to respond to the Second Amended Complaint, Defendants seek to extend their respective deadlines to answer or otherwise respond to the Second Amended Complaint to July 22, 2022. Baymark Management, LLC will also respond by this deadline, although it would otherwise have 60 days from receipt of a Waiver of Service to respond. Plaintiffs do not oppose the requested extension.

**II. ARGUMENT**

4. A court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A); *Doss v. Helpenstell*, 699 F. App'x 337, 339 (5th Cir. 2017) ("A district court's decision to grant a request for an extension of time is reviewed only for an abuse of discretion.").

5. As noted above, Defendants seek to extend the deadline for them to answer or otherwise respond to the Second Amended Complaint, in part, to provide a uniform response date for all Defendants.

6. Good cause exists for the requested extension, and it is not being sought for purposes of delay.

**III. PRAYER**

WHEREFORE, Defendants respectfully request that the Court enter an order extending the deadline for all Defendants to answer or otherwise respond to the Second Amended Complaint to July 22, 2022.

Respectfully submitted,

**HALLETT & PERRIN, P.C.**

By: /s/ Edward P. Perrin, Jr.

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**CERTIFICATE OF CONFERENCE**

Undersigned counsel certifies that Defendants' counsel have conferred with counsel for Plaintiffs, Jason Freemen, via e-mail, and Mr. Freemen indicated he is unopposed to the relief sought herein.

*/s/ Edward P. Perrin, Jr.*  
Edward P. Perrin, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing to be served on counsel of record on June 22, 2022 via the Court's CM/ECF system pursuant to the local rules of this Court.

*/s/ Edward P. Perrin, Jr.*  
Edward P. Perrin, Jr.

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